

11th April 2019
Our Ref: BRS/19.9002
REP ID: 983136

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Mr Ian Kemp
Programme Officer
Wiltshire Housing Site Allocations DPD

BY EMAIL

Dear Mr Kemp

Re: Wiltshire Housing Site Allocations Examination in Public, Additional Statement in respect of Underhill Nursery, Market Lavington (H1.2)

Further to the Inspector's Explanatory Note of the 13th March 2019 I set out below a short statement in respect of site H1.2 (Underhill Nursery, Market Lavington) which was identified as a proposed allocation within the submission version of the WHSAP [**WHSAP 01.01**], but then deleted through the Schedule of Proposed Changes [PC11, PC38 and PC46].

As explained at paragraphs 5.19 to 5.22 of our Matter 2 Hearing Statement, Topic Paper 6 [**TOP/06C**] sets out that there is a residual requirement of 81 dwellings (-16.5%) in the Devizes Community Area Remainder area. In order to meet this requirement, the submission WHSAP proposed allocations at Market Lavington, including land at Underhill Nursery (50 dwellings) (site ref 2055/530).

The decision to delete site H1.2 followed the Wiltshire Council 3rd July 2018 Cabinet meeting [**DEM/03**], where Members concluded that decisions on allocations at Market Lavington should be deferred to the Market Lavington Neighbourhood Plan.

As explained in Devizes Community Area Topic Paper [**CATP/06**] at paragraph 7.2, the justification for removing site allocations at Market Lavington was on the basis that there is a significant supply within the East Housing Market Area and furthermore; *"there is the opportunity, as set out at paragraph 6.4, for the Market Lavington Parish Council to allocate land for housing in their emerging Neighbourhood Plan."*

There is an inconsistency with the approach to Neighbourhood Plans in this context. Footnote 15 of Topic Paper 2 (Site Selection Process) [**TOP/02**] specifically refers to Neighbourhood Plans which have reached the Regulation 16 Stage, as the benchmark against which the status of a Neighbourhood Plan in preparation can be considered to sufficiently far advanced to defer decisions on future allocations to the neighbourhood plan process.



The stage of preparation of the Market Lavington Neighbourhood Plan has been updated through the Council's Matter 2 Hearing Statement at Appendix A, where it is acknowledged that the plan is at Regulation 14 stage. As such, it is clearly not sufficiently advanced for it to reach the threshold expressed in Topic Paper 2.

The approach to Market Lavington and subsequent removal of proposed allocations represents an inconsistent and flawed approach to Neighbourhood Plans and fails to respond positively, through specific allocations, to address the identified shortfall, in this case 81 dwellings.

Representations submitted by Persimmon Homes (Rep ID: 983136) in response to the Pre-Submission consultation (July to September 2017), expressed support for the allocation H1.2 as proposed. As a Local Service Centre, with only Devizes above it in the settlement hierarchy, it provides an appropriate and sustainable location to accommodate the residual indicative Core Strategy requirement. Site H1.2 was assessed in detail through the WHSAP site selection process and was recognised as being in a sustainable location with good access to local services and facilities.

It is recognised within the Devizes Community Area Topic Paper [**CATP/06**] that vehicular access to the site is "poor". Representations to the Pre-Submission consultation submitted on behalf of the promoters of the site [Rep ID: 1130978] reference options for forming a suitable vehicular access. These are identified as being enhanced access off Fiddington Hill, with improvements made to the junction with Fiddington Clay / Stirling Road. An alternative option is also identified as being a new vehicular access off Stirling Road (to the north west), passing through the plot of an existing dwelling.

Persimmon Homes controls land, including 22 Fiddington Hill, Hill Range and 1 Fiddington Hill such that this can facilitate the widening of the Fiddington Hill /Fiddington Clay junction, providing a safe and suitable access road (5.5m) and 2m wide footway on the north east side of Fiddington Hill, to serve the land previously proposed to be allocated. The extent of such improvements is illustrated by the access drawings attached to this statement.

The proposed alternative access arrangement, via a new access off Stirling Road, does not in our view, provide an appropriate option as it would extend the existing Stirling Road Cul-de-Sac and result in a convoluted route from the area proposed to be allocated to the High Street. Moreover, a vehicular access from Stirling Road would necessitate an interruption to the existing bridleway (MLAV24) which the Devizes Community Area Topic Paper [**CATP/06 – Page 87**] identifies as likely to need upgrading / improvements, along with EAST22, to improve pedestrian access/permeability through the site.

The disruption to the existing bridleway (MLAV24) does not, in our view, support an access arrangement at this location. It is therefore considered that the most appropriate access arrangements to serve H.12 will require the improvements to the Fiddington Hill / Fiddington Clay junction.

The decision to remove the H1.2 allocation and defer decisions on site allocations to the Neighbourhood Plan process is not considered to be justified or consistent with the WHSAP site selection process. Accordingly it is considered necessary and appropriate that allocation H1.2 should be reinstated into the WHSAP.

Yours sincerely

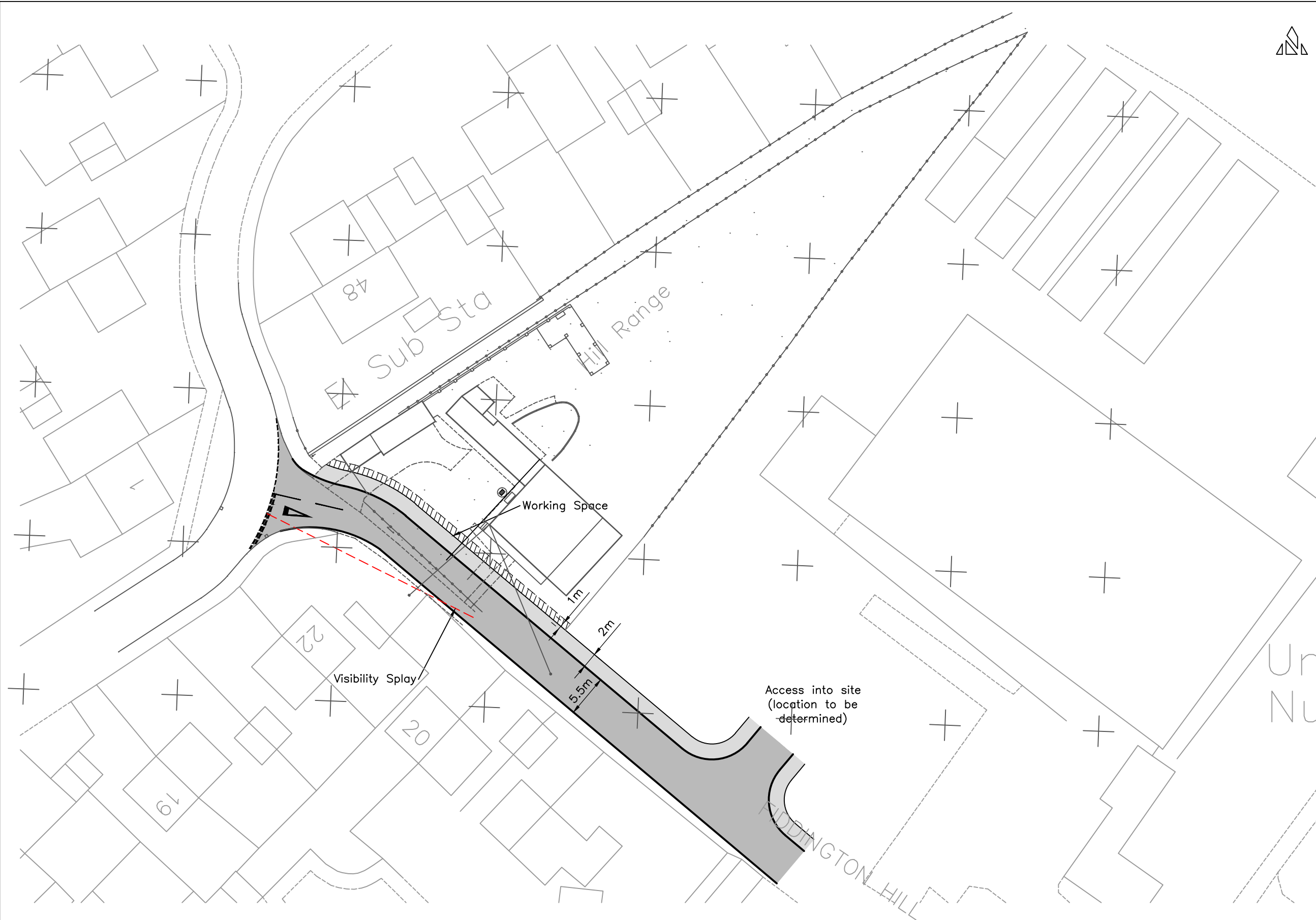
A handwritten signature in blue ink, appearing to read 'James Millard', with a large, stylized initial 'J'.

James Millard
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Enc. Fiddington Hill Access Drawing.



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Rev	Date	Description	Initials
B	20/08/12	Topographical survey added.	RML
A	02/05/12	Kerblines amended to preserve 2m footway	TLH

Client



**PERSIMMON
HOMES**

Project

**Land at Fiddington Clay,
Market Lavington**

Drawing Title

**Improvements to
Fiddington Hill**

Drawing No.	P591/1	Rev B
Date	March 2012	
Scale	1:500 @ A3	
Drawn By	AJM	
Checked By	GE	
E-Mail	geves@pfapl.com	
File Ref.	F:\Workfile\P591\Drawings\P591_1	

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